

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,
Debtor.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, et al.,

Defendants.

Adv. Pro. No. 09-01364 (SMB)

STIPULATION EXTENDING TIME TO RESPOND

WHEREAS, on December 5, 2010, the plaintiff, Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC and the estate of Bernard L. Madoff, filed an amended complaint (the “Amended Complaint”) in this adversary proceeding;

WHEREAS, defendant Ursula Radel-Leszczynski has agreed either to accept service of the summons and Amended Complaint or not to contest the validity of service of the Amended Complaint that has been complete, without waiving any other defenses; and

WHEREAS, on February 27, 2013, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including April 24, 2013; and

WHEREAS, on April 11, 2013, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including July 19, 2013; and

WHEREAS, on July 15, 2013, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including December 20, 2013; and

WHEREAS, on December 5, 2013, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including January 17, 2014; and

WHEREAS, on December 11, 2013, the Bankruptcy Court for the Southern District of New York entered an order granting supplemental authority for parties to an adversary proceeding to stipulate to, among other things, extensions of time (through no later than July 18, 2014) to move, answer, or otherwise respond to the operative complaint in such proceeding without further court order; and

WHEREAS, on January 8, 2014, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including March 3, 2014; and

WHEREAS, on March 28, 2014, the undersigned parties entered into a stipulation pursuant to which defendant Ursula Radel-Leszczynski received an extension of time to move, answer, or otherwise respond to the Amended Complaint up to and including May 30, 2014; and

WHEREAS, defendant Ursula Radel-Leszczynski has requested a further extension of time to move, answer, or otherwise respond to the Amended Complaint.

IT IS HEREBY STIPULATED AND AGREED, by the undersigned counsel, that:

1. Defendant Ursula Radel-Leszczyński acknowledges service of the summons and Amended Complaint and waives any challenges thereto.

2. The time by which defendant Ursula Radel-Leszczyński may move, answer, or otherwise respond to the Amended Complaint is extended up to and including July 18, 2014.

3. The Trustee reserves all rights and defenses, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses.

4. Except with regard to service of the summons and Amended Complaint, defendant Ursula Radel-Leszczyński reserves all rights and defenses, including, but not limited to, any challenges to the assertion of personal jurisdiction over defendant Ursula Radel-Leszczyński, and entry into this Stipulation shall not impair or otherwise affect such rights and defenses, including, but not limited to, defendant Ursula Radel-Leszczyński's right to seek further extensions of time from the Trustee.

5. This Stipulation may be signed by the parties in any number of counterparts, each of which when so signed shall be an original, but all of which shall together constitute one and the same instrument. A signed facsimile, photostatic, or electronic copy of this Stipulation shall be deemed and original. This Stipulation is entered into pursuant to the Order Granting Supplemental Authority to Stipulate to Extensions Of Time To Respond And Adjourn Pre-Trial

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Conferences (ECF No. 5600) in the above-captioned case (No. 08-01789 (SMB)).

Dated: May 22, 2014
New York, New York

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